

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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CHERYL SAGATAW, DEANTHONY  
BARNES, ROBERTA STRONG, and  
TRAVIS NELOMS, *on behalf of*  
*themselves and a class of*  
*similarly-situated individuals,*

Civil Action No.  
0:24-cv-00001-ECT/TNL

Plaintiffs,

vs.

MAYOR JACOB FREY, *in his*  
*individual and official capacity,*

**DECLARATION OF  
RONDEL APPLEBEE  
IN SUPPORT OF  
MOTION TO AMEND  
OPERATIVE COMPLAINT  
AND TO ADD PLAINTIFFS**

Defendant.

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**DECLARATION OF RONDEL APPLEBEE**

I, RonDel Applebee, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I'm 29 years old. I am Lakota and Ojibwe, descended from Standing Rock Oglala Sioux and enrolled at Fond DuLac.
2. I've lived in Minneapolis my whole life. I graduated from Augsbury Fairview Academy charter school. I used to go to Pow Wows a lot. I'm a singer, I sing on the drum. Not so much any more, but I want to start going again. That's how I grew up.
3. I first became homeless when I was fifteen. I ran away from home. I was living with family all over, I'd couch hop in Little Earth, with people I'd met at Pow wows. I used to bump heads with my dad, he'd just gotten out of prison, so I just ran. I have PTSD, chemical dependency, anxiety, and depression.
4. Do I remember any of the evictions? Ha ha. Which ones? I dread them. We have a horrible feeling of "where are we going to go? What are we going to do now?" We have to watch our stuff get bulldozed, everything we own is taken away. I was at the Wall of Forgotten Natives, and then I've been around Nenookaasi since day one. The first eviction we had all day to move. I was able to keep most of my stuff, and helping other people move too. Some people left some stuff behind though. That was the last eviction where people could come in and out and take multiple trips.
5. I was at the 26th and 14th eviction. I remember at that eviction the big army tent almost burned down, that could have been bad. We were rushed, but I grabbed some of my stuff. It's never all of my stuff. I wasn't allowed to come back for a second trip. I lost my ID and social security card because I didn't have time to find and save the folder that was in, I still haven't been able to replace that card yet. They were bulldozing everything that I wasn't able to grab. Once we grabbed our stuff and we left a certain area, they wouldn't let us back in.
6. After that I learned to put my most important things in one backpack and knew that I would probably risk losing everything else. A spend the night bag. That bag had one pair of clothes, hygiene stuff, chargers, phone, wallet, medicine, pictures, documents, all the important stuff.
7. One of the Nenookaasi evictions I wasn't at, since I was still a straggler trying to find everyone. I hadn't caught up to them yet by the time the eviction happened. That was the 22nd and 16th.
8. Then I caught up with them at the place the fire was. After the fire, I moved to 28th and 14th. My cousin Chance and I set up our tents close to each other. We grew up close, we

stick together. Family is all we have, especially now, we've had a lot of losses in our family and deaths for various reasons. We've lost a lot of people to overdoses. It's important to stay close to who we have left.

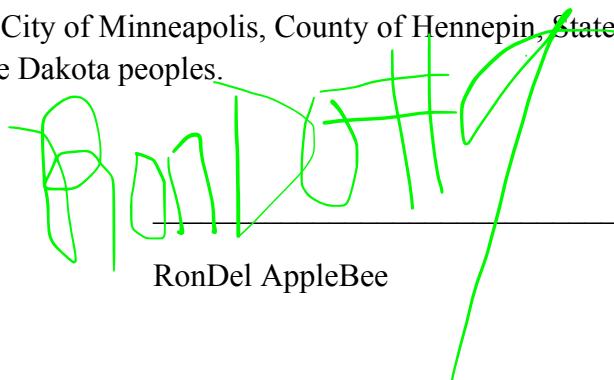
9. At the 28th and 14th encampment, I finally got housing through Helix. Someone came up from the city and referred me to Helix. I did my referral and waited 60 days. My mom actually got a house first through Helix over on North side, that came through while you were waiting for yours to come through. So I went to stay with her in her housing while you were waiting. But it was like a war zone. On 35th and Penn. Every week, if not every day, there were shootings. People dying. It felt unsafe. I was worried about my mom. Had to put her bedroom in the back, you never know when a bullet is going to fly through the window. One night it did. Another night we pushed our couch to the door and layed under it because people were shooting in the hallway of our building.
10. I think it was corrupt, putting my mom there at Helix housing. Not shortly after we moved in, the building we lived in got condemned. The week I moved out into my own housing was the week it got condemned. Felt like they put her there just to kick her out. They didn't even put my mom in other housing, when the building got condemned, her Helix worker didn't help her get new housing they put her back in a shelter. She's still there. And I went and picked out a house just down the block from here, in South Minneapolis. My mom doesn't stay with me but she visits sometimes.
11. I'm still there. Been there about two months, give or take. But I'm worried that won't last. They're playing with my funds. They're taking half of my general assistance to help pay my rent and that they'd pay the rest of it, but then I get emails saying that my rent hasn't fully been payed. I am worried about this, I don't know if my rent is paid this month and I will be back out on the street.
12. I don't trust the people that offer to store our stuff. I know someone (now she's my girlfriend but she wasn't at that time) that used service, people came up to her and said "hey put your stuff in this truck and we'll store it for you." It took her a month to find her stuff again, I think the whole truck got lost. The truck found her again because she had her name on one of her boxes of stuff. They ended up bringing the stuff back to camp. I didn't want to risk losing everything or not being able to access it when I needed it so I never stored stuff with anyone.
13. I don't remember meeting anyone from the Homeless Response Team.
14. Evictions made me lose hope. They keep tearing us down every time we build ourselves up. We lose our dignity. Our hope of being welcomed even by our own city.

15. After everything, the solution the city comes up with is to put fences and landscaping, rocks over land. The city is telling us “you are not welcome.” You can’t be homeless here. They make it seem like it’s illegal to be homeless in Minneapolis.

16. It’s hard being Native in Minneapolis. Especially for the females. Native females can’t even walk around outside after dark. They don’t care about us.

I declare under penalty of perjury that this declaration is true and correct.

Executed on September 14, 2024, in the City of Minneapolis, County of Hennepin, ~~State of~~ Minnesota, Treaty-Ceded Territory of the Dakota peoples.



RonDel AppleBee